

Exhibit 30
L. Franklin August 8, 2023 Deposition
Transcript Excerpts

In the Matter Of:

DOE vs

MINDGEEK USA

LAUREN FRANKLIN

August 08, 2023



1

2 UNITED STATES DISTRICT COURT
3 CENTRAL DISTRICT OF CALIFORNIA
4 SOUTHERN DIVISION

5 JANE DOE on behalf of herself and all others
6 similarly situated,

7 Plaintiff,

8 v.

9 MINDGEEK USA INCORPORATED, MINDGEEK S.A.R.L.,
10 MG FREESITES, LTD (D/B/A PORNHUB), MG
11 FREESITES II, LTD, MG CONTENT RT LIMITED, AND
12 9219-1568 QUEBEC, INC., (D/B/A MINDGEEK),

13 Defendants.

14 -----X

15 VIDEOTAPED DEPOSITION OF

16 LAUREN HERBERT FRANKLIN

17
18 DATE: August 8, 2023

19 TIME: 9:04 a.m.

20 PLACE: 1095 Avenue of the Americas, New
21 York, New York

22 BEFORE: Rebecca Schaumloffel, RPR, CCR-NJ

23 JOB NO: 2023-907124

20

1 L. FRANKLIN

2 notification of potential CSAM, we may have
3 treated that differently.

4 Q. What do you mean a review that
5 MindGeek did internally?

6 A. Meaning reviewing the content at
7 the outset rather than receiving a
8 notification from an individual.

9 Q. Well, we're talking about in the
10 circumstances of when Vobile MediaWise
11 detects potential CSAM, what would happen in
12 that circumstances to the CSAM content?

13 A. As far as preservation, I don't
14 know exactly what would happen in that
15 instance.

16 Q. Would the CSAM content be reported
17 to some law enforcement agency?

18 MS. MASSEY: Object to form.

19 A. In November 2019, we were not
20 reporting to a law enforcement agency. We
21 began reporting to NCMEC in April of 2020.

22 Q. In November 2019, you were not
23 reporting to law enforcement agencies or
24 NCMEC, correct?

25 MS. MASSEY: Object to form.

21

1 L. FRANKLIN

2 A. They were not reporting that
3 content at that time. That doesn't mean that
4 we didn't report content from November 2019
5 to NCMEC after the fact.

6 Q. What do you mean by content was
7 reported to NCMEC after the fact?

8 A. Meaning that even though we didn't
9 have the mechanism to report to NCMEC in
10 November of 2019, we can still report that
11 content to NCMEC later on after we formed
12 that -- the relationship to report to NCMEC.

13 Q. In November 2019, did MindGeek
14 have a relationship with law enforcement?

15 MS. MASSEY: Object to form.

16 A. MindGeek cooperated with law
17 enforcement upon receiving legal requests or
18 communication from law enforcement.

19 Q. But if MindGeek's technology like
20 Vobile MediaWise detected potential CSAM,
21 MindGeek would not report that content to law
22 enforcement in November 2019, correct?

23 MS. MASSEY: Object to form.

24 A. Again, at the -- in November 2019,
25 we were not reporting to NCMEC at that time,

33

1 L. FRANKLIN

2 co-performers in videos?

3 A. Can you clarify your question?

4 Q. Yoti is used to verify the
5 identity of a person who is an uploader to
6 MindGeek's website, correct?

7 A. Yes.

8 Q. If an uploader to MindGeek's
9 website is depicted in a video with another
10 performer, does that second performer have to
11 go through the Yoti verification process?

12 MS. MASSEY: Object to form.

13 A. Currently we don't require that
14 co-performer submits their identification.
15 We may in certain circumstances and we
16 encourage all of our performers to do so.

17 Q. In what circumstances would you
18 require the co-performer to submit to
19 identification?

20 A. An example of that would be if we
21 receive a complaint. If we receive a concern
22 about that content or if, internally, we flag
23 that as needing additional identity
24 verification documents.

25 Q. What do you mean a complaint about